

July 20, 1998

Matt Haber, Chief
Permits Office, Air Division
US EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Haber:

We have received your letter of July 2, 1998 regarding your comments on the Pacific Lumber Co. Title V permit. We wish to respond to the comments as follows:

1. Comment concerning the need for increased particulate matter testing of the cyclones at Mill B(Factory). EPA misunderstands our revised monitoring. We have proposed an annual source test with the possibility that an exclusion may be granted only if the District's quarterly emissions evaluations of the cyclones indicates compliance. The test exclusion can only be granted if both of the following conditions are met: (1) the grain loading is one-half the limit(about a 20% limit), but also(and EPA did not mention this) (2) if the total cyclone systems are less than the allowable 40 lbs/hr. As mentioned in comment #2 this is equivalent to about a 5% average visible emission from all seven systems! A most difficult requirement to meet for these systems unless they are performing exceedingly well. In any case, a test at least once per permit term of five years will be required. We believe this is a most appropriate technique for these difficult and cumbersome to test cyclone systems. Increased testing where our evaluation does not indicate a need seems inappropriate. We plan to utilize the same technique that was approved in our previously issued Title V permit for Louisiana-Pacific Corporation, Arcata in order to provide the same procedures for all cyclone systems under our jurisdiction. Our experience with our evaluation process will expose those systems that are in need of testing to determine compliance. The visible emission vs. grain loading correlation we developed at the District is based upon our own testing and the results have been utilized in our evaluations of cyclone systems successfully for two decades.

2. Comment regarding the removal of the 5% average opacity limitation from the cyclone systems at the Factory. The 5% was placed in the original ATC since this was the correlation of opacity vs. grain loading that would cause the emission of about 40 lbs/hr of particulate matter. We felt that instead of using the 5% limitation, we should simply use the 40 lbs/hr since this is the limit. We may find techniques other than opacity to evaluate the compliance status of the systems in the future. Therefore, we applaud EPA for not objecting to this issue.

3. Comment concerning the 24-hour averaging time for CO and NOx for Boiler C

compared to the 3-hour averaging time for Boilers A and B. The EPA is concerned that a short term 1-hour peak in the emissions of CO could cause an exceedance of the 1-hour NAAQS. The District has performed air dispersion modeling using the Screen 3 model to determine what magnitude of emissions from the boilers would be required to cause an exceedance of the NAAQS. Our results are attached, which indicate that at maximum boiler load and maximum CO emissions rate of 0.60 lbs/mmbtu, one boiler would have a worst case impact of 91 ug/m³. For all three boilers at the same load and at maximum CO emissions rate of 0.60 lbs/mmbtu, the worst case impact would be 274 ug/m³. At ten times the maximum emissions rate for CO, the impact would be 2740 ug/m³ or about 12% of the CA state standard and only 7% of the NAAQS! Clearly having a short term CO limit to protect the NAAQS is not necessary. Also there are no CO short term ambient standard violations in California outside of a handful found in Southern California.

4. Comment regarding disposition of the old permits for the facility. For the sake of clarity from the perspective of the Permittee, the District wishes to make it very clear that the requirements contained in the Title V permit are the only ones that the permittee will be subject to for compliance and enforcement purposes. This is the purpose of our paragraph concerning prior permits which become obsolete with the issuance of a new all encompassing Title V permit. To require that old NSR, ATC or PTO permits are still valid, questions the need for the Title V process especially for the purpose of streamlining prior permit requirements. The District agrees with the position presented in the STAPPA/ALAPCO May 15, 1998 letter to John Seitz. The District requests EPA Region 9 to reconsider its position on this issue.

The District appreciates EPA's comments regarding our proposed permit, however based upon our responses, we are planning to issue the Title V permit to The Pacific Lumber Company.

Sincerely,

Wayne Morgan
Air Pollution Control Officer

cc: Dave Howekamp, EPA
John Campbell, TPL
Ray Menebroker, ARB
David Faulkner, Mendocino County AQMD
Barbara Lee, Northern Sonoma County APCD
Bob Reynolds, Lake County AQMD